

**REMARKS**

Claims 1-13 are pending in this application. Claims 7 and 8 are withdrawn. By this Amendment, claim 1 and 7 are amended. No new matter is added. Support for the amendment can be found, for example, at least on page 9 of the published application. Reconsideration of this application in view of the above amendments and the following remarks is respectfully requested.

The courtesies extended to Applicant's representatives by Examiner Rhee at the telephone interview held September 12, 2011 are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below, which constitute Applicant's separate record of the substance of the interview.

**I. Claim Rejections Under 35 U.S.C. §§102(b) And 103(a)**

Claims 1-6 and 9-13 are rejected under 35 U.S.C. §102(b) as anticipated by, or in the alternative, under 35 U.S.C. §103(a) as obvious over U.S. Patent Application Publication No. 2004/0086757 to Mohapatra. These rejections are respectfully traversed

Amended independent claim 1 recites "based on a correlation between a parameter related to the temperature of the coolant and the electric conductivity of the coolant, when the electric conductivity at the target set temperature exceeds a target electric conductivity range, the control unit being programmed to control the parameter related to the temperature of the coolant so as to maintain the electric conductivity at the target set temperature within the target electric conductivity range." Mohapatra fails to disclose at least these novel features.

Specifically, Mohapatra does not disclose the control unit recited by claim 1. Rather, Mohapatra discloses a temperature controller 216 that controls the heater 214, in order to maintain temperature of the coolant 218 at a predetermined temperature of 70°C. Mohapatra also discloses a conductive probe 223 that measures the electric conductivity of the coolant 218. (See Mohapatra, paragraphs [0084] - [0086]). Furthermore, the apparatus disclosed in

Fig. 2 of Mohapatra is used solely as an experimental device for testing the electric conductivity of the coolant 218; thus, it does not contain a structure for cooling the coolant 218. In contrast, it uses the heater 214 to heat the coolant until it achieves a temperature of 70°C.

At least for the aforementioned reasons, Mohapatra fails to anticipate and would not have rendered obvious the novel features of independent claim 1. For similar reasons, Mohapatra also fails to anticipate and would not have rendered obvious the features of claim 13.

Claims 2-6 and 9-12 depend from an allowable independent claim, and thus, are allowable, at least for their dependence on an allowable claim, as well as for any additional features they recite.

Accordingly, Applicant respectfully requests withdrawal of the rejections.

## **II. Rejoinder**


Upon the allowance of at least claim 1, rejoinder of claims 7 and 8 is respectfully requested. See MPEP §821.04.

## **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Meghan J. Carmody  
Registration No. 67,117

JAO:MQC/ccs

Date: September 23, 2011

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 320850**  
**Alexandria, Virginia 22320-4850**  
**Telephone: (703) 836-6400**

**DEPOSIT ACCOUNT USE  
AUTHORIZATION**

Please grant any extension  
necessary for entry of this filing;  
Charge any fee due to our  
Deposit Account No. 15-0461